

## 2023 Report on Forced Labour and Child Labour

This Report addresses the period from January 1, 2023 to December 31, 2023 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)(the “Act”). This Report is made on behalf of GNI Management Group Inc.

### 1. Introduction

GNI Management Group Inc (the “Company”, “GNI”) acknowledges our responsibility to combat forced and child labour and are committed to acting ethically and with integrity and transparency. We are working to put systems and controls in place to safeguard against any form of forced or child labour occurring within our supply chain.

### 2. Our Business

GNI Management Group Inc provides building envelope and insulation services within the residential, commercial, industrial, and agricultural sectors. GNI offers a complete list of building envelope products and services for new and retrofit projects to increase energy efficiency, comfort, and structural durability. Founded in 1980, GNI has grown to 11 locations and over 350 employees across Ontario, Quebec, and Manitoba.

### 3. Our Supply Chains

GNI purchases all supplies through Canadian distributors. GNI reviews key suppliers to ensure that they have Human Rights, Labour and Social Standards policies in place.

### 4. Our Policies

GNI expects each of its employees to comply with all applicable laws. The Company is also committed to promoting honesty and integrity and maintaining the highest standards of ethical conduct in all of its activities. GNI’s reputation is founded on the personal integrity of its employees. GNI’s success is dependent on establishing and maintaining trusting relationships, which are built on this foundation of integrity. As a result, it is the responsibility of each of its employees to live up to the standards of ethical conduct adopted by GNI and set out in our company Mission, Vision and Values as reflected the GNI Employee Handbook (the “Handbook”).



As a representative of GNI, each employee occupies a position of trust in their interactions with other employees, government authorities and GNI’s business partners, investors, advisors, suppliers, portfolio companies and other stakeholders. The Handbook is intended to help guide employees in these interactions and to ensure that their behavior is consistent with the standards of ethical conduct adopted by the Company.

GNI is committed to operating within the framework of all applicable laws, rules, regulations and orders. To ensure GNI’s compliance with applicable laws, all employees should take reasonable steps to familiarize themselves with the legal framework affecting their corporate duties and ensure that their conduct is compliant.

Employees must promptly report all violations of applicable laws of the Handbook. An employee who breaches any applicable laws or the Handbook, or observes such a breach, must immediately report it to his or her immediate supervisor. GNI will protect from retribution or retaliation any employee who, in good faith, reports actual or perceived breaches of any applicable laws or the Handbook by other employees or problems with GNI’s policies, procedures or practices.

## 5. Assessing Our Risk

No formal assessment of the risk of Forced Labour and Child Labour in our supply chain was conducted between January 1, 2023, and December 31, 2023. We intend to undertake this assessment in 2024.

## 6. Our Commitments

All employees are required to read and understand the GNI Employee Handbook when they join the firm and are required to annually attest to having read and understood the current document in effect at the beginning of each calendar year.

Employee Training on the issues surrounding Forced Labour and Child Labour in the supply chain has not been established at GNI.

## 7. Our Plans for 2024

Area	Actions
Forced labour and child labour risks	Establish risk assessments to gain understanding of potential exposure to forced labour and child labour risks in our supply chain.
Due Diligence	Establish a supplier due diligence framework as it relates to forced labour and child labour risks.



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#### 8. Approval & Signature/Attestation

This report was approved by Bill Maginas (CEO) on May 15, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in compliance with the Act. This Report is also available on our website at [www.gni.ca](http://www.gni.ca)

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Bill Maginas  
CEO  
GNI Management Group Inc

May 15, 2024